From: Beeler, Cindy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9B11E688258C462BAB293A6DF8FF4B27-BEELER, CYNTHIA]

Sent: 6/18/2019 2:52:38 PM

To: Beeler, Cindy [Beeler.Cindy@epa.gov]; Thomas, Deb [thomas.debrah@epa.gov]

CC: Patefield, Scott [Patefield.Scott@epa.gov]; Morales, Monica [Morales.Monica@epa.gov]

Subject: Options Selection for Oil and Natural Gas NSPS Technical Reconsideration (Tier 2, SAN 5719.8)

Attachments: NSPS OOOOa Pre-OStechnical6.19.19.docx

Location: WJC - N 5400 + Video with RTP + Ex. 6 Personal Privacy (PP)

Start: 6/24/2019 3:45:00 PM **End**: 6/24/2019 4:30:00 PM

Show Time As: Busy

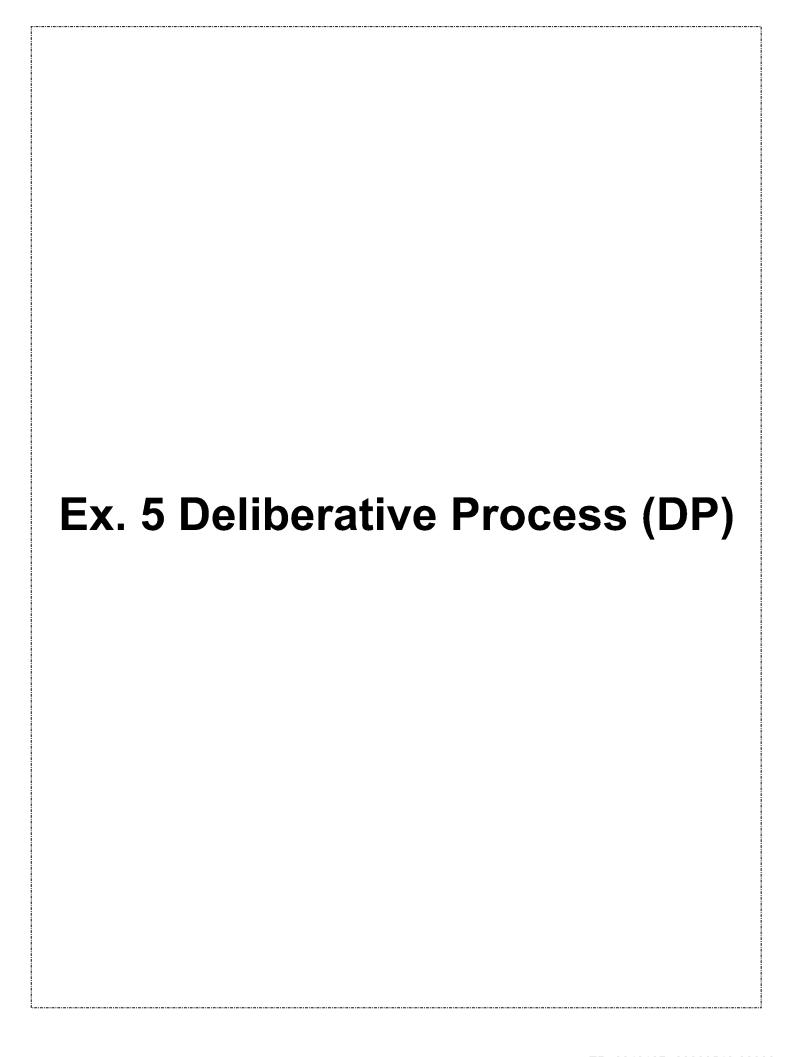
All - I've updated recommendations because I would like to submit them to the national workgroup so they have a more complete description of our key points if we run out of time on this call to elaborate.

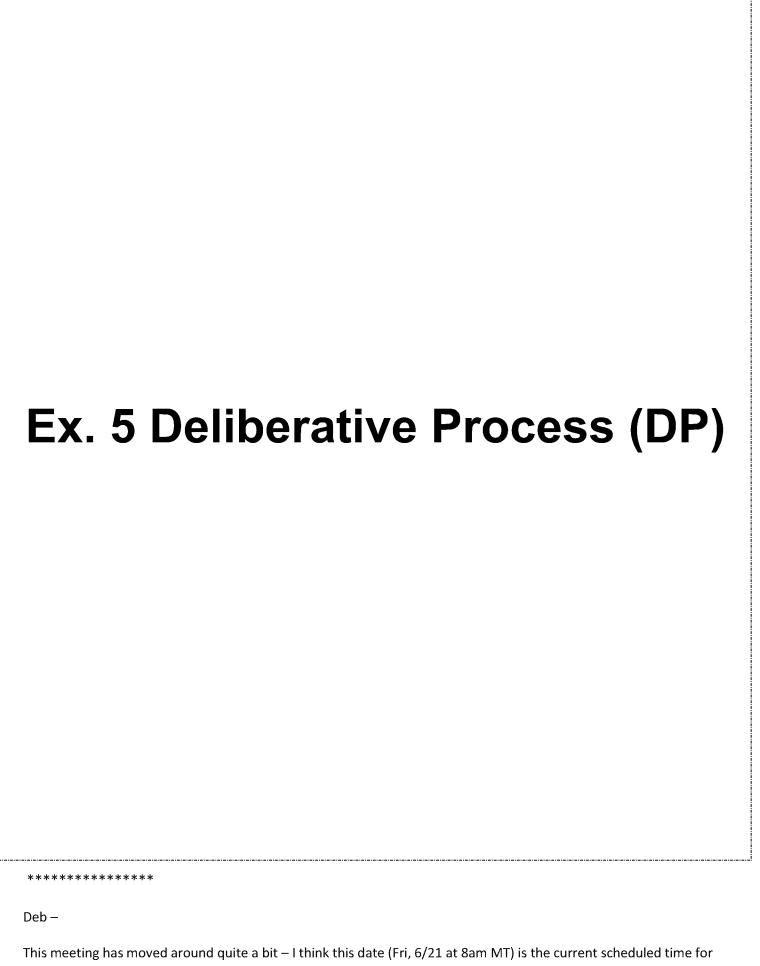
I am also placing all pieces of this virtual briefing into this single calendar invitation: (1) Key Points, (2) R8 Regulators' Comments and (3) Status of the overall NSPS OOOOa revisions.

Key Points

1.

Ex. 5 Deliberative Process (DP)





Options Selection briefing with Wehrum on the "technical package" portion of NSPS OOOOa revisions. I have Friday, 6/21 off but can sit in on the call from home.

OAQPS is still working on management review of the materials for Options Selection but is sharing the attached **draft** that their management is reviewing. OAQPS is still reviewing the information in the materials and this will likely be updated before Friday.

Let me know if you have any specific questions.	
******** Further Background *******	
Deb –	

The national workgroup has not received a copy of the briefing document that is to be used for Options Selection with Bill Wehrum. I will forward it to you once I receive it. I have Friday, 6/21 off but can sit in on the call from home.

FYI, here is the status of the revisions to NSPS OOOOa:

REGULATORY REVISIONS TO NSPS OOOOA Status 6/10/19

Ex. 5 Deliberative Process (DP)

- OAQPS is currently preparing Options Selection briefing material for Division Director and ultimately for Wehrum for the final rule. Current schedule:
 - o FAR June/July 2019
 - o OMB Review July 2019
 - Final Package for signature August 30, 2019
- R8 has agreed to the following requested expediting and waivers of the ADP process during this rulemaking:
 - Down-tier SAN 5719.8 from Tier 1 to Tier 2 (R8 sent 12/11/17 recommending Tier2 rather than down to Tier 3 this will now be a Tier 2)
 - Waive Analytic Blue Print on SAN 5719.8 (R8 sent 1/4/18)
 - Waive Early Guidance on SAN 5719.8 (R8 sent 1/24/18)

- Expedite FAR on proposed SAN 5719.8 (R8 sent 2/7/18)
- Waive Analytic Blueprint as the technical package goes final (R8 sent 5/13/19)

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Ex. 5 Deliberative Process (DP)

Other

- CTGs (Control Techniques Guidelines)
 - On 3/1/18 the EPA signed a notice seeking public comment on withdrawing the 2016
 Control Techniques Guidelines for the Oil and Natural Gas Industry (Oil and Gas CTG).

Ex. 5 Deliberative Process (DP)

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